

Case Number: 1:18 - CV - 00123 (PKC) (PK)

PROPOSED DISCOVERY PLAN			
	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	X		
2. Rule 26(a)(1) disclosures exchanged			By 12/12/18
3. Requests made:			
a. Medical records authorization			By 12/12/18
b. Section 160.50 releases for arrest records		X	
c. Identification of John Doe/Jane Doe defendants		X	
d. Proposed Stipulation of Confidentiality			By 12/12/18
4. Procedures for producing Electronically Stored Information (ESI) discussed			By 12/12/18
B. SETTLEMENT			
1. Plaintiff to make settlement demand			12/31/2018
2. Defendant to make settlement offer			1/7/2019
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)		X	
4. Settlement Conference (proposed date)			04/__/2019
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings			1/21/2019
2. Initial documents requests and interrogatories			2/25/2019
3. All fact discovery to be completed (including disclosure of medical records)			10/25/2019
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			10/30/2019
5. Expert discovery (only if needed)	Check here if not applicable <input type="checkbox"/>		

Plaintiff expert proposed field of expertise:			
Defendant expert proposed field of expertise:			
	DONE	NOT APPLICABLE	DATE
a. Case-in-chief expert report due			
b. Rebuttal expert report due			Defendant reserves right
c. Depositions of experts to be completed			
6. Completion of ALL DISCOVERY			10/25/2019
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			10/30/2019
8. If District Judge requires Pre-Motion Conference, date to make request			11/18/2019
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule		X	
10. Joint Pre-Trial Order due (if no dispositive motion filed)			11/18/2019
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases			
a. Response due		X	
b. Reply due		X	
2. Motion for Rule 23 class certification			
a. Response due		X	
b. Reply due		X	

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Peggy Kuo

PEGGY KUO

United States Magistrate Judge

12/12/18
Date